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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
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10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 DRAGOMIR TASKOV, et al,

14 Defendants.
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2:10-cr-217-PMP-PAL

STIPULATION FOR PROTECTIVE ORDER

17 IT IS HEREBY STIPULATED AND AGREED between the parties, DANIEL G.
18 BOGDEN, United States Attorney for the District of Nevada, and ERIC JOHNSON, Assistant
19 United States Attorney, counsel for the United States, and Charles E. Kelly, counsel for defendant
20 Nikolay Mladenov, that this Court issue an Order protecting from disclosure to the public any
21 discovery documents containing the personal identifying information such as social security
22 numbers, drivers license numbers, dates of birth, or addresses, of participants, witnesses and
23 victims in this case. Such documents shall be referred to hereinafter as "Protected Documents."
24 The parties state as follows:
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1 1. Protected Documents which may be used by the government in its case in chief
2 include personal identifiers, including social security numbers, drivers license numbers, dates of
3 birth, and addresses, of participants, witnesses, and victims in this case.

4 2. Discovery in this case is voluminous and many of these documents include personal
5 identifiers. Redacting the personal identifiers of participants, witnesses, and victims would prevent
6 the timely disclosure of discovery to the defendant.

7 3. The United States agrees to provide Protected Documents without redacting the
8 personal identifiers of participants, witnesses, and victims

9 4. Access to Protected Documents will be restricted to persona authorized by the
10 Court, namely defendant, attorneys of record and attorneys, paralegals, investigators, experts, and
11 secretaries employed by the attorneys of record and performing on behalf of defendant.

12 5. The following restrictions will be placed on the defendant, defendant's attorney and
13 the above-designated individuals unless and until further ordered by the Court. Defendant,
14 defendant's attorney and the above-designated individuals shall not:

15 a. make copies for, or allow copies of any kind to be made by any other person
16 of Protected Documents;

17 b. allow any other person to read Protected Documents; and

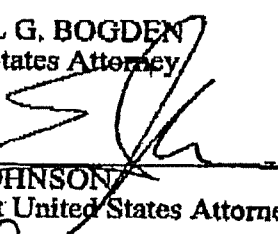
18 c. use Protected Documents for any other purpose other than preparing to
19 defend against the charges in the Superseding Indictment or any further superseding indictment
20 arising out of this case.

21 6. Defendant's attorney shall inform any person to whom disclosure may be made
22 pursuant to this order of the existence and terms of this Court's order.

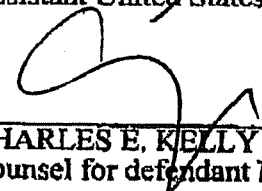
23 7. The requested restrictions shall not restrict the use or introduction as evidence of
24 discovery documents containing personal identifying information such as social security numbers,
25 drivers license numbers, dates of birth, and addresses during the trial of this matter.
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1 8. Upon conclusion of this action, defendant's attorney shall return to government
2 counsel or destroy and certify to government counsel the destruction of all discovery documents
3 containing personal identifying information such as social security numbers, drivers license
4 numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days after the
5 last appeal is final.

6 DANIEL G. BOGDEN
United States Attorney

7 
8 ERIC JOHNSON
9 Assistant United States Attorney

7-22-10
DATE

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11 CHARLES E. KELLY
12 Counsel for defendant Nikolay Mladenov

7/25/10
DATE

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15 **ORDER**

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18 IT IS SO ORDERED this ____ day of ____ 2010.

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21 **UNITED STATES MAGISTRATE JUDGE**
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